

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                                    |   |                                      |
|------------------------------------|---|--------------------------------------|
| IN RE: ZIMMER NEXGEN KNEE          | ) |                                      |
| IMPLANT PRODUCTS LIABILITY         | ) | MDL NO. 2272                         |
| LITIGATION                         | ) |                                      |
|                                    | ) |                                      |
| This Document Relates to All Cases | ) | Master Docket Case No. 1:11-cv-05468 |
|                                    | ) |                                      |
|                                    | ) | Honorable Rebecca Pallmeyer          |

**AGREED MOTION FOR ENTRY OF CASE MANAGEMENT ORDER NO. 4**

The defendants, Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., Zimmer US, Inc., and Zimmer Production, Inc. (collectively "Defendants"), move this Court to approve and enter proposed Case Management Order No. 4, attached hereto as Exhibit 1. The terms of Case Management Order No. 4 have been agreed upon by the parties following substantial negotiation.

WHEREFORE, Defendants, by agreement of the parties, respectfully move the Court for approval and entry of proposed Case Management Order No. 4

FAEGRE BAKER & DANIELS LLP

/s/ J. Stephen Bennett

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J. Stephen Bennett (Ill. State Bar #6226615)  
111 East Wayne Street, Suite 800  
Fort Wayne, IN 46802-2600  
Telephone: (260) 424-8000  
Fax: (260) 460-1700  
Email: stephen.bennett@faegrebd.com

Joseph H. Yeager, Jr. (Ind. State Bar #2083-49)  
Andrea Roberts Pierson (Ind. State Bar #18435-49-A)  
J. Stephen Bennett (Ind. State Bar #22869-02)  
300 North Meridian Street, Suite 2700  
Indianapolis, IN 46204  
Telephone: (317) 237-0300  
Fax: (317) 237-1000  
Email: jay.yeager@bakerd.com  
andrea.pierson@bakerd.com

Attorneys for Zimmer, Inc., Zimmer Holdings, Inc.,  
Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic  
Surgical Products, Inc., Wilson/ Phillips Holdings, Inc.,  
d/b/a Zimmer Wilson/Phillips, Orthopaedic  
Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly  
named as (1) Zimmer Tri-State d/b/a Tri-State  
Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc.,  
and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic),  
K. Michael Melia, d/b/a Zimmer Melia & Associates,  
Inc. (incorrectly named as Zimmer Melia & Associates,  
Inc.), Zimmer Orthobiologics, Inc., Zimmer US, Inc.,  
and Zimmer Production, Inc.

**CERTIFICATE OF SERVICE**

I certify that on May 31, 2012, a copy of the foregoing **Agreed Motion For Entry Of Case Management Order No. 4** was filed electronically. Parties may access this filing through the Court's ECF/CFM system.

/s/ J. Stephen Bennett